

Supporting Statement for Paperwork Reduction Act Submission
OMB Control Number 1018-0100
Information Collection In Support of Grant Programs Authorized
by the North American Wetlands Conservation Act (NAWCA)
July 29, 2005

Terms of Clearance. OMB granted approval for this information collection in August 2002 with the following terms of clearance: Upon the Department of the Interior's next request to extend this information collection, the Agency shall describe the outcome of efforts currently underway to accommodate the electronic submission of data and to what extent those efforts have decreased burden.

We have addressed our efforts to accommodate the electronic submission of grant applications in paragraph 3. While electronic submission will significantly decrease the paper burden on applicants, it will not reduce the time burden. The project narrative is the heart of this information collection request. Whether applicants prepare narratives electronically or in hard copy, the same amount of time will be required.

Specific Instructions

A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

The North American Waterfowl Management Plan (NAWMP), first signed in 1986, is a tripartite agreement among Canada, Mexico and the United States to enhance, restore and otherwise protect continental wetlands to benefit waterfowl and other wetland-associated wildlife through partnerships between and among the private and public sectors. Because the 1986 NAWMP did not carry with it a mechanism to provide for broadly based and sustained financial support for wetland conservation activities, Congress passed and the President signed into law the North American Wetlands Conservation Act (Act) of 1989 to fill that funding need. The purpose of the Act, as amended, is to promote long-term conservation of North American wetland ecosystems and the waterfowl and other migratory birds, fish and wildlife that depend upon such habitat through partnerships. Principal conservation actions supported by NAWCA are acquisition, enhancement, and restoration of wetlands and wetlands-associated upland habitats.

In addition to providing for a continuing and stable funding base, the Act establishes an administrative body (Council) made up of State representatives from each of the four flyways, three representatives from wetlands conservation organizations, the Secretary of the Board of the National Fish and Wildlife Foundation, and the Director of the Fish and Wildlife Service. The

Council recommends wetlands conservation project proposals to the Migratory Bird Conservation Commission (MBCC) for funding. Subsection (c), Section 5 (Council Procedures) of the Act provides that the "...Council shall establish practices and procedures for the carrying out of its functions under Subsections (a) and (b) of this section..." which are consideration of projects and recommendations to the MBCC, respectively. The Council uses the grants programs (coordinated by the Division of Bird Habitat Conservation) to decide which project proposals are important to recommend to the MBCC.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. [Be specific. If this collection is a form or a questionnaire, every question needs to be justified.]

From September 1990 through December 2004, more than 2,000 partners have been involved in 1,108 Standard Grant projects. More than \$630.5 million has been invested through the Act; total partner contributions have amounted to more than \$1.9 billion. Approximately 23.2 million acres of wetlands and associated uplands have been affected across the continent. Since 1996, we have funded 236 small grant projects, involving more than 650 partners. Partners added more than \$68.6 million to more than \$10.1 million in grants to conserve some 79,880 acres of habitats in the United States.

Competing for grant funds involves applications from partnerships that describe in substantial detail project locations, project resources, future benefits, and other characteristics, to meet the standards established by the Council and the requirements of NAWCA. The narrative is the heart of this information collection request. We use the narratives to determine eligibility, the scale of resource values or relative worth of the proposed projects, and how well the proposed projects meet the purposes of the Act. The collection also responds to regulations at 43 CFR 12 and 49 CFR 24, and Secretarial and Bureau directives for administering Federal Assistance grants.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden [and specifically how this collection meets GPEA requirements].

We no longer publish and distribute Standard and Small Grant Instructional Booklets. Materials that describe the program and assist applicants in formulating project proposals for Council consideration are available on our website (www.birdhabitat.fws.gov). However, those who are unable to access a computer may still obtain instructional materials by regular mail. Consistent with directives to move to E-Government, we permit electronic applications and about 50 percent of the applicants submit applications by e-mail or disk, which is a considerable lessening of the paper burden on applicants. A large portion of the balance of the unconverted program is

planned for conversion in the next year. Currently, very little hard copy is employed to communicate with applicants and grant recipients; virtually all of these communications are by phone, e-mail, or facsimile. We advertise these grant programs in the Catalog of Federal Domestic Assistance and on the Grants.Gov (Find) website.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

The overall program covers Canada, Mexico and the United States, and the information sought is unique for the NAWCA programs. Also, the information sought for evaluation to determine relative project importance is unique to each location, situation and to each application.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

Small entities, e.g., small land trusts and conservancies, would be affected in the same way and to the same degree as larger entities. Most of the applicants and grantees qualify as small entities. We collect only the minimum of information necessary for participation in the NAWCA grants program.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Elimination of the information collection would result in elimination of the programs as it would be otherwise impossible to determine eligibility and the scale of resource values or relative worth of the proposed projects. Reducing the frequency of collection would only reduce the frequency of grant opportunities.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- * requiring respondents to report information to the agency more often than quarterly;
- * requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- * requiring respondents to submit more than an original and two copies of any document;
- * requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
- * in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- * requiring the use of a statistical data classification that has not been reviewed and approved by OMB;

- * that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- * requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

There are no special circumstances placed on respondents.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice [and in response to the PRA statement associated with the collection over the past three years] and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. [Please list the names, titles, addresses, and phone numbers of persons contacted.]

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

On May 19, 2005, we published in the **Federal Register** (70 FR 28951) a 60-day notice of our intent to request renewal of this information collection authority from OMB. In that notice, we solicited public comments for 60 days, ending on July 18, 2005. We received one comment regarding this notice. The commenter did not address the necessity, clarity, or accuracy of the information collection, but stated that the North American Waterfowl Management Plan and the Council, as constituted, are used to kill waterfowl not save them. In addition, the commenter petitions to reconstitute the Council with different members and requests program materials. We have not made any changes to our information collection as a result of the comment.

We interviewed five previous and current recipients of NAWCA grants with regard to three aspects of the grants programs: the availability of the information requested, the clarity of the instructions, and the annual burden hours for preparing applications and other materials, such as annual and final reports for both the Small Grant and Standard Grants programs. Some respondents had experience with only one of the programs, some had experience with both. Following is contact information for four of the five individuals:

Mr. Todd Bishop, Grants Coordinator, Iowa Department of Natural Resources,
515.281.7127

Mr. Glenn Lamb, President, Columbia Land Trust, 360.696.0131

Ms. Sharon Liederman, Grants Specialist, The Nature Conservancy, 406.443.6729

Mr. Jon Schneider, Waterfowl Biologist, Ducks Unlimited, 320.762.9916.

All respondents interviewed advised that the information regarding descriptions of both programs and application instructions is readily available and that the clarity of the information/instructions for both programs is good. Two of the three respondents who have had experience with the Small Grants Program estimated 56 hours to prepare an application, while the third respondent estimated 120 to 160 hours. An important factor determining this estimate is the complexity of the project. None of these estimates included the time involved in documentation of progress (annual and final reports) required during the course of the project. Thus, we believe our original estimate of 80 hours is reasonable.

With regard to Standard Grants, three respondents estimated 200 to 250 hours, 320 hours, and 400 hours for the processes leading up to and including writing the narrative. Again, these estimates do not include the writing of annual and final reports and providing documentation of activities. Additional hours for writing annual and final reports and providing documentation of activities would increase the burden hours, making our estimated 400-hour figure reasonable.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

Other than recommendations by the Council and decisions by the MBCC to award grant monies to successful applicants, we do not make any payments or gifts to applicants or grant recipients.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

There is no confidentiality needed or involved in the information that the applicants or grant recipients provide as a result of the information collection.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

We do not require applicants or grant recipients to answer questions of a personal or other sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- * Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- * If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**
- * Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

It is extremely difficult to make meaningful estimates of annual burden hours for application preparation, especially for Standard Grants, because there are so many variables. Burden estimates vary significantly from project to project depending on technical competence, repetitive practice (applications), complexity of the project, and/or the level of grantsmanship that an applicant's grant writer may have invested in the application.

Initially, we determined the burden hours and costs by estimating the number of applications (150) that are submitted for funding at the end of a grant year. This average number has remained remarkably stable over the past several years and includes the applications for the Small Grants and Standard Grants programs. The estimated total, annual hourly burden for grant application construction (32,000 for Standard Grants and 5,600 for Small Grants) is the product of the estimate of the average time taken for these activities; i.e., 400 hours and 80 hours for Standard and Small, respectively, and the number of applications. The total estimated cost/year is \$800,000 and \$140,000 for Standard and Small grants, respectively. The grand total cost per year (\$940,000) is the sum of the totals of the products of the annual hourly burden and the estimated cost/hour.

Type of Grant	Number of Applicants	No. of Applications	Average Time Prep.	Annual Burden Hrs.	Burden Cost/Hr.	Total Cost/Yr.
Standard	80	80	400 hrs.	32,000 hrs.	\$25	\$800,000
Small	70	70	80 hrs	5,600 hrs.	\$25	\$140,000
Total	150	150		37,600 hrs.	\$25	\$940,000

13. Provide an estimate of the total annual [non-hour] cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

- * The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information [including filing fees paid]. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
- * If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- * Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

There is no nonhour cost burden to respondents.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

Since the Division of Bird Habitat Conservation deals almost exclusively with the information collection and processing carried out under the authority of the Act, the entire annual administrative budget (approximately \$2.1 million) could be interpreted as the cost of this program to the Federal Government.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

There are no changes to items 13 and 14.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

We do not plan to publish data from this information collection.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

We are not seeking a waiver from the requirement to display the expiration date of the OMB approval of the information collection.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

There are no exceptions to the certification statement in item 19 of OMB Form 83-I.

B. Collections of Information Employing Statistical Methods

This collection does not employ statistical methods.